

**THE HONORABLE PETER A. CAHILL  
FOURTH JUDICIAL DISTRICT  
CIVIL PRACTICE POINTERS & PREFERENCES**

**I. Contact with Chambers**

- All communications with chambers regarding scheduling and administrative issues should be conducted via email to [4thJudgeCahillChambers@courts.state.mn.us](mailto:4thJudgeCahillChambers@courts.state.mn.us), copying all counsel of record. Parties should meet and confer to identify mutual agreeable proposed dates for hearings or conferences before emailing chambers.
- Judge Cahill may allow telephonic conferences upon request where the parties agree it would be appropriate.

**II. Motion Practice**

- Parties should meet and confer regarding requests for continuances or changes in a scheduling order before emailing chambers. The email should state the requested change, the grounds for the request, and whether or not any other party or parties object to the request. Judge Cahill will not grant such a request unless good cause is shown.
- Proposed orders should be e-filed in MS Word format under the “proposed order” event code.

**III. Written Submissions**

- Judge Cahill does not wish to receive courtesy hardcopies of written submissions. Courtesy copies should be submitted via the e-file courtesy copy function.

**IV. In-Court Proceedings**

- Judge Cahill carefully reads the briefs before the oral argument. Judge Cahill does not use oral argument to listen to attorneys summarize what is in the briefs; instead, he uses oral argument to engage in a back-and-forth discussion of the case with the attorneys. Counsel should focus on the most important points and supporting caselaw and be prepared to answer detailed questions about the case, including questions about cited caselaw and the evidence in the record.
- Judge Cahill discourages the presentation of new case authority at oral argument. Courtesy copies of any new authority should be provided to the Court and opposing counsel in advance of the hearing.
- Judge Cahill encourages attorneys to use the courtroom’s technology when presenting at hearings. Attorneys should familiarize themselves with any equipment they intend to use in advance of the hearing.

**V. Pretrial Procedures**

- Judge Cahill will ask prospective jurors questions during *voir dire* as well as allow attorneys to conduct *voir dire*. Attorneys may submit questions for Judge Cahill to ask prospective jurors. Attorneys may not discuss the following during *voir dire*: the facts of the case or similar hypotheticals, instructions on the law, suggestions that prospective jurors “put themselves in the shoes of” of any party or witness, or the attorney’s background. Judge Cahill strongly urges counsel to use *voir dire* to obtain information from jurors, and not to use *voir dire* to present information to jurors.
- The attorneys or parties shall provide the Court with witness lists and jury instructions at least one day prior to trial, unless otherwise ordered.

**VI. Trial**

- Trial days are generally scheduled from 9 a.m. to noon with one 20 minute break, and continue from 1:30 p.m. to 4:30 p.m. with a second 20 minute break.
- Attorneys should stand and state the basis for making any objection. Attorneys may request to approach the bench if they wish to argue the objection.
- Attorneys may stand at the podium or sit or stand at counsel’s table when examining witnesses or addressing the jury.
- Permission is required to approach the witness during cross-examination. Permission is not required to approach a party’s own witness.
- Trial exhibits should be marked in advance of their introduction. Where the parties anticipate voluminous exhibits, they should meet and confer in advance of trial to establish a convention minimizing the possibility that different exhibits will be marked with the same number.